

UNITED STATES DISCTRRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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KEENAN T. KNIGHT,

Plaintiff,

v.

Case No. 23-cv-886

AMIKA AVERY,  
JORDAN TAYLOR, and  
TERRELL WILLIAMS

Defendants.

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**DECLARATION OF DALE R. NIKOLAY**

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STATE OF WISCONSIN      )  
                                )  
                                ) SS  
MILWAUKEE COUNTY      )  
                                )

I, Dale R. Nikolay, declare pursuant to 28 U.S.C. § 1746, and under penalty of perjury that the following is true and correct:

1. I am a licensed attorney admitted to practice and in good standing in the State of Wisconsin.
2. I am one of the attorneys representing defendants Amika Avery, Jordan Taylor and Terrell Williams (the “Defendants”) in the above-captioned matter.
3. I make this declaration based on my personal knowledge of the facts attested to herein.
4. On April 16, 2024, I deposed Keenan Knight concerning his claims made in the above-captioned matter. Attached hereto as **Exhibit 1** is a true and correct copy of Mr. Knight’s April 16, 2024 deposition transcript.

5. Attached hereto as **Exhibit 2** are true and correct copies of excerpts taken from Mr. Knight's certified medical records in the possession of Milwaukee County, as maintained by Wellpath LLC.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.  
Executed on August 1, 2024.

s/ Dale R. Nikolay  
DALE R. NIKOLAY